

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED,

Plaintiff,

vs.

FORTINET, INC.,

Defendant.

Case No. 2:22-cv-00322-JRG

JURY TRIAL DEMANDED

**DECLARATION OF DAVID C. DOTSON IN SUPPORT OF
DEFENDANT FORTINET, INC.'S MOTION TO TRANSFER
TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, David C. Dotson, declare and state the following:

1. My name is David C. Dotson. I provide this declaration in support of Fortinet's Motion to Transfer to the Northern District of California. I have personal knowledge of the following based upon my representation of Fortinet, Inc. ("Fortinet") in this matter and, if called as a witness, I could and would testify competently thereto.

2. I am an attorney at the law firm of Duane Morris LLP, am a member in good standing of the Bar of the State of Georgia, and am admitted to represent Fortinet in this action.

3. Fortinet has addressed in this motion the accused products that Lionra purported to chart in its original infringement contentions.

4. On December 7, 2022, Fortinet sent a letter to Lionra identifying deficiencies with Lionra's infringement contentions and the impact on the scope of accused products.

5. On January 17, 2023, Lionra served purported amended infringement contentions.

6. In its January 26 response, Fortinet stated that it will oppose a motion by Lionra to amend its contentions, as the purported amended contentions remain deficient and do not comply

with the Local Patent Rules with respect to the products and supporting materials added to the claim charts.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. This 7th day of February, 2023, in Atlanta, Georgia.

/s/ David C. Dotson

David C. Dotson